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March 26, 2020

Via Hand Delivery

Jocelyn G. Boyd
 Chief Clerk/Administrator
Public Service Commission of South Carolina
 Post Office Drawer 11649
 Columbia, SC 29211

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 CBA 3.15/2020

**Re: Ganymede Solar, LLC – Joint Motion to Withdraw Petition and Motion to Maintain Status Quo and Request for Confidential Treatment
 Docket Number 2019-390-E**

Dear Ms. Boyd:

Dominion Energy South Carolina, Inc. ("DESC") and Ganymede Solar, LLC ("Solar Developer") hereby file with the Public Service Commission of South Carolina (the "Commission") the enclosed Joint Motion to Withdraw Petition and Motion to Maintain Status Quo (the "Joint Motion").

Solar Developer plans to construct an approximately 75 MW solar generating facility that will be a Qualifying Facility under 18 C.F.R. § 292.204. Solar Developer entered into an Interconnection Agreement with DESC on May 7, 2018, which was amended on June 15, 2018 (as amended, the "IA"). On December 20, 2019, Solar Developer filed a Motion to Maintain Status Quo (the "Motion") and a Petition (the "Petition") in the above-referenced docket. On March 25, 2020, the Commission issued Order No. 2020-257 (the "Order") approving a Settlement Agreement (the "Settlement") between DESC and Solar Developer which amicably resolved the issues pertaining to the Petition and the Motion. Accordingly, DESC and Solar Developer now wish to file the Joint Motion and withdraw the Petition and the Motion.

However, due to the commercially sensitive and proprietary nature of the Settlement, as well as the highly competitive nature of the industry in which Solar Developer and DESC operate, DESC and Solar Developer have agreed to keep the terms of the Settlement and the Joint Motion confidential. Indeed, the Order granted DESC's and Solar Developer's request for confidential treatment of the Settlement. As such, in accordance with the terms of the Settlement, DESC and Solar Developer now respectfully request that the Commission treat the Joint Motion in a similar manner by finding that the Joint Motion contains protected information and issue a protective order barring the disclosure of the Joint Motion under the Freedom of

Information Act, S.C. Code Ann. §§ 30-4-10 et seq., S.C. Code Ann. Regs. 103-804(S)(1), or any other provision of law. Pursuant to S.C. Code Ann. Regs. 103-804(S)(2), the determination of whether a document may be exempt from disclosure is within the Commission's discretion.

To this end, and in accordance with Commission Order No. 2005-226, dated May 6, 2005, in Docket No. 2005-83-A, we enclose with this letter a redacted version of the Joint Motion that protects the sensitive information from disclosure, while making available for public viewing non-protected information. We also enclose a copy of the unredacted Joint Motion in a separate, sealed envelope and respectfully request that, in the event that anyone should seek disclosure of this unredacted version, the Commission notify DESC of such request and provide it with an opportunity to obtain an order from this Commission or a court of competent jurisdiction protecting the Joint Motion from disclosure.

Enclosed are the following:

1. A true and correct copy of the original Joint Motion in a sealed envelope marked "CONFIDENTIAL." Each page of the Joint Motion is also marked "CONFIDENTIAL."
2. Ten (10) copies of a redacted copy of the Joint Motion for filing and public disclosure.

By copy of this letter, we are providing the South Carolina Office of Regulatory Staff ("ORS") with a redacted copy of the Joint Motion for its records. Additionally, DESC will make the original, unredacted copy of the Joint Motion available to ORS for its review.

In conclusion, DESC and Solar Developer have amicably resolved the issues related to the Petition and the Motion via the Settlement. DESC and Solar Developer come now with the Joint Motion contemplated thereby and request confidential treatment of the same. Thank you for your assistance and consideration of this matter. If you have any questions, please do not hesitate to contact me at your convenience.

Sincerely,



J. Ashley Cooper

JAC:hmp

cc: (Via Electronic Mail and First Class Mail)
Alexander W. Knowles, Esquire
Christopher Huber, Esquire
Richard L. Whitt, Esquire

BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
DOCKET NO. 2019-390-E

IN RE:	Ganymede Solar, LLC,)	
	Petitioner,)	
)	
	Dominion Energy South Carolina,)	JOINT MOTION TO WITHDRAW PETITION AND MOTION TO MAINTAIN STATUS QUO
	Inc.,)	
	Respondent.)	
)	
)	

Ganymede Solar, LLC ("Ganymede") and Dominion Energy South Carolina, Inc. ("DESC") jointly, and without objection from the Office of Regulatory Staff, submit this Joint Motion to Withdraw Petition and Motion to Maintain Status Quo (the "Joint Motion")

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Respectfully Submitted,

/s/ J. Ashley Cooper

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Cayce, South Carolina
March 26, 2020